

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IN RE

AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775 (JG) (VVP)

THIS DOCUMENT RELATES TO:
All Actions

**PLAINTIFFS' NOTICE OF MOTION TO AUTHORIZE DISSEMINATION OF
CLASS NOTICE AND CLAIM FORM AND TO SCHEDULE FAIRNESS HEARING
FOR FINAL APPROVAL OF PROPOSED SETTLEMENTS, APPLICATION FOR
ATTORNEYS' FEES AND EXPENSES AND APPROVAL OF PLAN OF ALLOCATION**

PLEASE TAKE NOTICE THAT, upon Plaintiffs' Memorandum in Support of Motion to Authorize Dissemination of Class Notice and Claim Form and to Schedule Fairness Hearing for Final Approval of Proposed Settlements, Application for Attorneys' Fees and Expenses and Approval of Plan of Allocation, dated March 5, 2012, and all other papers and proceedings herein, plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable John Gleeson, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure to enter an order in connection with the nine settlements entered between plaintiffs and the following defendants: (1) Lan Airlines, S.A., Lan Cargo, S.A., and Aerolinhas Brasileiras, S.A.; (2) British Airways Plc; (3) Malaysia Airlines; (4) South African Airways Ltd.; (5) Saudi Arabian Airlines, Ltd.; (6) Emirates; (7) El Al Israel Airlines Ltd.; (8) Air Canada and AC Cargo LP; and (9) Salvatore Sanfilippo

- i. directing settlement class counsel to disseminate notices and claim forms to the settlement class;

- ii. setting a deadline for class members to exclude themselves from any or all of the nine settlements;
- iii. setting deadlines for class members to serve and file any objections to any or all of the nine settlements, the request for attorneys' fees and litigation expenses, and the Plan of Allocation for the distribution of the settlements;
- iv. scheduling a Fairness Hearing to (a) determine the fairness, reasonableness, and adequacy of the nine settlements, and whether each should be finally approved by the Court; (b) evaluate plaintiffs' request for attorneys' fees and litigation expenses; and (c) evaluate the Plan of Allocation for distribution of the nine settlements; and
- v. granting such other and further relief as may be appropriate.

Dated: New York, New York
March 5, 2012

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